

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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GOVERNMENT EMPLOYEES INSURANCE CO., et al.,

Plaintiffs,

-against-

Docket No.: 12 CV 04295
(NG)(JO)

AMD CHIROPRACTIC, P.C., et al.

Defendants.

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NOTICE OF MOTION FOR DEFAULT JUDGMENT

PLEASE TAKE NOTICE that Plaintiffs Government Employees Insurance Company, GEICO Indemnity Company, GEICO General Insurance Company, and GEICO Casualty Company respectfully move this Court for entry of a default judgment against Defendants AMD Chiropractic, P.C., St. Marks Chiropractic, P.C., DGI Chiropractic, P.C. and Danette Stefanelli, D.C. pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure, together with such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(b), any papers in opposition to this motion shall be served within 14 days of service of these motion papers.

Dated: Uniondale, New York
December 14, 2012

Respectfully submitted,

RIVKIN RADLER LLP

By: _____/s/

Barry I. Levy (BL 2190)

Max Gershenoff (MG 4648)

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Insurance Co., GEICO Indemnity Co., GEICO
General Insurance Company and GEICO Casualty
Co.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 14th day of December, 2012, a copy of the foregoing Notice of Motion, Memorandum of Law, the Declaration of Max Gershenoff, the Declaration of Jennifer Fogarty, and the exhibits annexed thereto, were filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

_____/s/ Max Gershenoff

Max Gershenoff (MG 4648)